INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
We make Indiana a cleaner, healthier place to live.

Joseph E. Kernan
Governor

Lori F. Kaplan
Commissioner

100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
(317) 232-8603
(800) 451-6027
www.in.gov/idem

January 29, 2004

TO: Interested Parties / Applicant

RE: Mohawk Flush Doors, Inc / 141-17223-00058

FROM: Paul Dubenetzky
Chief, Permits Branch
Office of Air Quality

Notice of Decision: Approval - Effective Immediately

Please be advised that on behalf of the Commissioner of the Department of Environmental Management, I have issued a decision regarding the enclosed matter. Pursuant to IC 13-15-5-3, this permit is effective immediately, unless a petition for stay of effectiveness is filed and granted according to IC 13-15-6-3, and may be revoked or modified in accordance with the provisions of IC 13-15-7-1.

If you wish to challenge this decision, IC 4-21.5-3 and IC 13-15-6-1 require that you file a petition for administrative review. This petition may include a request for stay of effectiveness and must be submitted to the Office of Environmental Adjudication, 100 North Senate Avenue, Government Center North, Room 1049, Indianapolis, IN 46204, **within eighteen (18) calendar days of the mailing of this notice**. The filing of a petition for administrative review is complete on the earliest of the following dates that apply to the filing:

(1) the date the document is delivered to the Office of Environmental Adjudication (OEA);
(2) the date of the postmark on the envelope containing the document, if the document is mailed to OEA by U.S. mail; or
(3) The date on which the document is deposited with a private carrier, as shown by receipt issued by the carrier, if the document is sent to the OEA by private carrier.

The petition must include facts demonstrating that you are either the applicant, a person aggrieved or adversely affected by the decision or otherwise entitled to review by law. Please identify the permit, decision, or other order for which you seek review by permit number, name of the applicant, location, date of this notice and all of the following:

(1) the name and address of the person making the request;
(2) the interest of the person making the request;
(3) identification of any persons represented by the person making the request;
(4) the reasons, with particularity, for the request;
(5) the issues, with particularity, proposed for considerations at any hearing; and
(6) identification of the terms and conditions which, in the judgment of the person making the request, would be appropriate in the case in question to satisfy the requirements of the law governing documents of the type issued by the Commissioner.

If you have technical questions regarding the enclosed documents, please contact the Office of Air Quality, Permits Branch at (317) 233-0178. Callers from within Indiana may call toll-free at 1-800-451-6027, ext. 3-0178.

Enclosures
FNPER.dot 9/16/03

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FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) OFFICE OF AIR QUALITY

Mohawk Flush Doors, Inc.
402 N. Sheridan
South Bend, Indiana 46619

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

The Permittee must comply with all conditions of this permit. Noncompliance with any provisions of this permit is grounds for enforcement action; permit termination, revocation and reissuance, or modification; or denial of a permit renewal application. Noncompliance with any provision of this permit, except any provision specifically designated as not federally enforceable, constitutes a violation of the Clean Air Act. It shall not be a defense for the Permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. An emergency does constitute an affirmative defense in an enforcement action provided the Permittee complies with the applicable requirements set forth in Section B, Emergency Provisions.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-8 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: F 141-17223-00058	
Issued by: Original Signed by Paul Dubenetzky Paul Dubenetzky, Branch Chief Office of Air Quality	Issuance Date: January 29, 2004 Expiration Date: January 29, 2009

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SECTION A SOURCE SUMMARY

This permit is based on information requested by the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ). The information describing the source contained in Conditions A.1 through A.3 is descriptive information and does not constitute enforceable conditions. However, the Permittee should be aware that a physical change or a change in the method of operation that may render this descriptive information obsolete or inaccurate may trigger requirements for the Permittee to obtain additional permits or seek modification of this permit pursuant to 326 IAC 2, or change other applicable requirements presented in the permit application.

A.1 General Information [326 IAC 2-8-3(b)]

The Permittee owns and operates a stationary wood door manufacturing source.

Authorized individual:	General Manager
Source Address:	402 N. Sheridan, South Bend, Indiana 46619
Mailing Address:	402 N. Sheridan, South Bend, Indiana 46619
General Source Phone:	(574) 288-4464
SIC Code:	2431
County Location:	St. Joseph Attainment for all criteria pollutants
Source Status:	Federally Enforceable State Operating Permit (FESOP) Minor Source, under PSD Rules; Minor Source, Section 112 of the Clean Air Act

A.2 Emission Units and Pollution Control Equipment Summary [326 IAC 2-8-3(c)(3)]

This stationary source consists of the following emission units and pollution control devices:

(a) Machining and woodworking equipment, with units constructed between 1971 and 1995, including saws, routers, sanders, planers, one (1) edge bander, one (1) profiler, one (1) panel saw, hardware assembly, and a wood chipper, with a maximum capacity of 15,000 pounds of raw materials per hour, controlled by a cyclone/baghouse system (DC1), and exhausting to stack DCX, with captured sawdust conveyed to a storage bin.

(b) Machining and woodworking equipment, constructed in 2003, including one (1) single sided edge bander, one (1) sander planer, one (1) straight line rip saw and one (1) KVAL D1 line, equipped with a single baghouse dust collector (DC2) and exhausting to stack DCX, with captured saw dust conveyed to a storage bin, capacity: 18,700 pounds of raw materials (wood and plastic) per hour.

(c) One (1) two-stage spray booth, identified as AB, reconstructed in 1998, utilizing a high volume low pressure (HVLP) application system, with overspray controlled by dry filters, and exhausting to either stack A or B, maximum capacity: 103 wood doors per hour.

(d) One (1) spray booth, identified as C, constructed in 1984, utilizing a high volume low pressure (HVLP) application system, with overspray controlled by dry filters, and exhausting to stack C, maximum capacity: 103 wood doors per hour.

(e) One (1) spray booth, identified as D, constructed in 1994, utilizing a high volume low pressure (HVLP) application system, with overspray controlled by dry filters, and exhausting to stack D, maximum capacity: 103 wood doors per hour.

(f) One (1) spray booth, identified as E, constructed in 1999, utilizing a high volume low pressure

(HVLP) application system with overspray controlled by dry filters and exhausting to stack E, maximum capacity: 103 wood doors per hour.

A.3 Insignificant Activities [326 IAC 2-7-1(21)] [326 IAC 2-8-3(c)(3)(I)]

This stationary source also includes the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

(1) One (1) natural gas fired heater, capacity: 1.7 million British thermal units per hour.

(2) Three (3) natural gas fired forced air systems, capacity: 0.58 million British thermal units per hour, each.

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone (Table saw equipped with a self contained vacuum drum).

(c) Closed loop heating and cooling systems.

(d) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.

A.4 FESOP Applicability [326 IAC 2-8-2]

This stationary source, otherwise required to have a Part 70 permit as described in 326 IAC 2-7-2(a), has applied to the Indiana Department of Environmental Management (IDEM), Office of Air Quality (OAQ) for a Federally Enforceable State Operating Permit (FESOP).

A.5 Prior Permits Superseded [326 IAC 2-1.1-9.5]

(a) All terms and conditions of previous permits issued pursuant to permitting programs approved into the state implementation plan have been either

(1) incorporated as originally stated,

(2) revised, or

(3) deleted

by this permit.

(b) All previous registrations and permits are superseded by this permit.

SECTION B GENERAL CONDITIONS

B.1 Permit No Defense [IC 13]

Indiana statutes from IC 13 and rules from 326 IAC, quoted in conditions in this permit, are those applicable at the time the permit was issued. The issuance or possession of this permit shall not alone constitute a defense against an alleged violation of any law, regulation or standard, except for the requirement to obtain a FESOP under 326 IAC 2-8.

B.2 Definitions [326 IAC 2-8-1]

Terms in this permit shall have the definition assigned to such terms in the referenced regulation. In the absence of definitions in the referenced regulation, the applicable definitions found in the statutes or regulations (IC 13-11, 326 IAC 1-2, and 326 IAC 2-7) shall prevail.

B.3 Permit Term [326 IAC 2-8-4(2)] [326 IAC 2-1.1-9.5]

This permit is issued for a fixed term of five (5) years from the issuance date of this permit, as determined in accordance with IC 4-21.5-3-5(f) and IC 13-15-5-3. Subsequent revisions, modifications, or amendments of this permit do not affect the expiration date.

B.4 Enforceability [326 IAC 2-8-6]

Unless otherwise stated, all terms and conditions in this permit, including any provisions designed to limit the source's potential to emit, are enforceable by IDEM, the United States Environmental Protection Agency (U.S. EPA) and by citizens in accordance with the Clean Air Act.

B.5 Termination of Right to Operate [326 IAC 2-8-9] [326 IAC 2-8-3(h)]

The Permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least nine (9) months prior to the date of expiration of the source's existing permit, consistent with 326 IAC 2-8-3(h) and 326 IAC 2-8-9.

B.6 Severability [326 IAC 2-8-4(4)]

The provisions of this permit are severable; a determination that any portion of this permit is invalid shall not affect the validity of the remainder of the permit.

B.7 Property Rights or Exclusive Privilege [326 IAC 2-8-4(5)(D)]

This permit does not convey any property rights of any sort, or any exclusive privilege.

B.8 Duty to Provide Information [326 IAC 2-8-4(5)(E)]

(a) The Permittee shall furnish to IDEM, OAQ, within a reasonable time, any information that IDEM, OAQ, may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with this permit. The submittal by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1). Upon request, the Permittee shall also furnish to IDEM, OAQ, copies of records required to be kept by this permit.

(b) For information furnished by the Permittee to IDEM, OAQ, the Permittee may include a claim of confidentiality in accordance with 326 IAC 17.1 When furnishing copies of requested records directly to U.S. EPA, the Permittee may assert a claim of confidentiality in accordance with 40 CFR 2, Subpart B.

B.9 Compliance Order Issuance [326 IAC 2-8-5(b)]

IDEM, OAQ may issue a compliance order to this Permittee upon discovery that this permit is in nonconformance with an applicable requirement. The order may require immediate compliance or contain a schedule for expeditious compliance with the applicable requirement.

B.10 Certification [326 IAC 2-8-3(d)] [326 IAC 2-8-4(3)(C)(i)] [326 IAC 2-8-5(1)]

(a) Where specifically designated by this permit or required by an applicable requirement, any application form, report, or compliance certification submitted shall contain certification by an authorized individual of truth, accuracy, and completeness. This certification, shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.

(b) One (1) certification shall be included, using the attached Certification Form, with each submittal requiring certification.

(c) An authorized individual is defined at 326 IAC 2-1.1-1(1).

B.11 Annual Compliance Certification [326 IAC 2-8-5(a)(1)]

(a) The Permittee shall annually submit a compliance certification report which addresses the status of the source's compliance with the terms and conditions contained in this permit, including emission limitations, standards, or work practices. The initial certification shall cover the time period from the date of final permit issuance through December 31 of the same year. All subsequent certifications shall cover the time period from January 1 to December 31 of the previous year, and shall be submitted in letter form no later than April 15 of each year to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

(b) The annual compliance certification report required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(c) The annual compliance certification report shall include the following:

(1) The appropriate identification of each term or condition of this permit that is the basis of the certification;

(2) The compliance status;

(3) Whether compliance was continuous or intermittent;

(4) The methods used for determining the compliance status of the source, currently and over the reporting period consistent with 326 IAC 2-8-4(3); and

(5) Such other facts as specified in Sections D of this permit, IDEM, OAQ, may require to determine the compliance status of the source.

The notification which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

B.12 Preventive Maintenance Plan [326 IAC 1-6-3] [326 IAC 2-8-4(9)] [326 IAC 2-8-5(a)(1)]

(a) If required by specific condition(s) in Section D of this permit, the Permittee shall maintain and implement Preventive Maintenance Plans (PMPs), including the following information on each

facility:

(1) Identification of the individual(s) responsible for inspecting, maintaining, and repairing emission control devices;

(2) A description of the items or conditions that will be inspected and the inspection schedule for said items or conditions; and

(3) Identification and quantification of the replacement parts that will be maintained in inventory for quick replacement.

(b) The Permittee shall implement the PMPs, including any required record keeping, as necessary to ensure that failure to implement a PMP does not cause or contribute to an exceedance of any limitation on emissions or potential to emit.

(c) A copy of the PMPs shall be submitted to IDEM, OAQ, upon request and within a reasonable time, and shall be subject to review and approval by IDEM, OAQ. IDEM, OAQ, may require the Permittee to revise its PMPs whenever lack of proper maintenance causes or is the primary contributor to an exceedance of any limitation on emissions or potential to emit. The PMP does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(d) To the extent the Permittee is required by 40 CFR Part 60/63 to have an Operation, Maintenance, and Monitoring (OMM) Plan for a unit, such Plan is deemed to satisfy the PMP requirements of 326 IAC 1-6-3 for that unit.

B.13 Emergency Provisions [326 IAC 2-8-12]

(a) An emergency, as defined in 326 IAC 2-7-1(12), is not an affirmative defense for an action brought for noncompliance with a federal or state health-based emission limitation, except as provided in 326 IAC 2-8-12.

(b) An emergency, as defined in 326 IAC 2-7-1(12), constitutes an affirmative defense to an action brought for noncompliance with a health-based or technology-based emission limitation if the affirmative defense of an emergency is demonstrated through properly signed, contemporaneous operating logs or other relevant evidence that describes the following:

(1) An emergency occurred and the Permittee can, to the extent possible, identify the causes of the emergency;

(2) The permitted facility was at the time being properly operated;

(3) During the period of an emergency, the Permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or other requirements in this permit;

(4) For each emergency lasting one (1) hour or more, the Permittee notified IDEM, OAQ Northern Regional Office, within four (4) daytime business hours after the beginning of the emergency, or after the emergency was discovered or reasonably should have been discovered;

Telephone No.: 1-800-451-6027 (ask for Office of Air Quality, Compliance Section) or,
Telephone No.: 317-233-5674 (ask for Compliance Section)

Facsimile No.: 317-233-5967

Northern Regional Office: 574-245-4870, facsimile 574-245-4877

(5) For each emergency lasting one (1) hour or more, the Permittee submitted the attached Emergency Occurrence Report Form or its equivalent, either by mail or facsimile to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

within two (2) working days of the time when emission limitations were exceeded due to the emergency.

The notice fulfills the requirement of 326 IAC 2-8-4(3)(C)(ii) and must contain the following:

(A) A description of the emergency;

(B) Any steps taken to mitigate the emissions; and

(C) Corrective actions taken.

The notification which shall be submitted by the Permittee does not require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(6) The Permittee immediately took all reasonable steps to correct the emergency.

(c) In any enforcement proceeding, the Permittee seeking to establish the occurrence of an emergency has the burden of proof.

(d) This emergency provision supersedes 326 IAC 1-6 (Malfunctions). This permit condition is in addition to any emergency or upset provision contained in any applicable requirement.

(e) IDEM, OAQ, may require that the Preventive Maintenance Plans required under 326 IAC 2-8-3(c)(6) be revised in response to an emergency.

(f) Failure to notify IDEM, OAQ, by telephone or facsimile of an emergency lasting more than one (1) hour in accordance with (b)(4) and (5) of this condition shall constitute a violation of 326 IAC 2-8 and any other applicable rules.

(g) Operations may continue during an emergency only if the following conditions are met:

(1) If the emergency situation causes a deviation from a technology-based limit, the Permittee may continue to operate the affected emitting facilities during the emergency provided the Permittee immediately takes all reasonable steps to correct the emergency and minimize emissions.

(2) If an emergency situation causes a deviation from a health-based limit, the Permittee may not continue to operate the affected emissions facilities unless:

(A) The Permittee immediately takes all reasonable steps to correct the emergency situation and to minimize emissions; and

(B) Continued operation of the facilities is necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw material of substantial economic value.

Any operations shall continue no longer than the minimum time required to prevent the situations identified in (g)(2)(B) of this condition.

(h) Permittee shall include all emergencies in the Quarterly Deviation and Compliance Monitoring Report.

B.14 Deviations from Permit Requirements and Conditions [326 IAC 2-8-4(3)(C)(ii)]

(a) Deviations from any permit requirements (for emergencies see Section B - Emergency Provision), the probable cause of such deviations, and any response steps or preventive measures taken shall be reported to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

using the attached Quarterly Deviation and Compliance Monitoring Report, or its equivalent. A deviation required to be reported pursuant to an applicable requirement that exists independent of this permit, shall be reported according to the schedule stated in the applicable requirement and does need to be included in this report.

The Quarterly Deviation and Compliance Monitoring Report does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) A deviation is an exceedance of a permit limitation or a failure to comply with a requirement of the permit.

B.15 Permit Modification, Reopening, Revocation and Reissuance, or Termination [326 IAC 2-8-4(5)(C)] [326 IAC 2-8-7(a)] [326 IAC 2-8-8]

(a) This permit may be modified, reopened, revoked and reissued, or terminated for cause. The filing of a request by the Permittee for a FESOP modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any condition of this permit. [326 IAC 2-8-4(5)(C)] The notification by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) This permit shall be reopened and revised under any of the circumstances listed in IC 13-15-7-2 or if IDEM, OAQ determines any of the following:

(1) That this permit contains a material mistake.

(2) That inaccurate statements were made in establishing the emissions standards or other terms or conditions.

(3) That this permit must be revised or revoked to assure compliance with an applicable requirement. [326 IAC 2-8-8(a)]

(c) Proceedings by IDEM, OAQ, to reopen and revise this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening and revision shall be made as expeditiously as practicable. [326 IAC 2-8-8(b)]

(d) The reopening and revision of this permit, under 326 IAC 2-8-8(a), shall not be initiated before

notice of such intent is provided to the Permittee by IDEM, OAQ, at least thirty (30) days in advance of the date this permit is to be reopened, except that IDEM, OAQ, may provide a shorter time period in the case of an emergency. [326 IAC 2-8-8(c)]

B.16 Permit Renewal [326 IAC 2-8-3(h)]

(a) The application for renewal shall be submitted using the application form or forms prescribed by IDEM, OAQ, and shall include the information specified in 326 IAC 2-8-3. Such information shall be included in the application for each emission unit at this source, except those emission units included on the trivial or insignificant activities list contained in 326 IAC 2-7-1(21) and 326 IAC 2-7-1(40). The renewal application does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Request for renewal shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, IN 46206-6015

(b) Timely Submittal of Permit Renewal [326 IAC 2-8-3]

(1) A timely renewal application is one that is:

(A) Submitted at least nine (9) months prior to the date of the expiration of this permit; and

(B) If the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

(2) If IDEM, OAQ, upon receiving a timely and complete permit application, fails to issue or deny the permit renewal prior to the expiration date of this permit, this existing permit shall not expire and all terms and conditions shall continue in effect until the renewal permit has been issued or denied.

(c) Right to Operate After Application for Renewal [326 IAC 2-8-9]
If the Permittee submits a timely and complete application for renewal of this permit, the source's failure to have a permit is not a violation of 326 IAC 2-8 until IDEM, OAQ takes final action on the renewal application, except that this protection shall cease to apply if, subsequent to the completeness determination, the Permittee fails to submit by the deadline specified in writing by IDEM, OAQ, any additional information identified as needed to process the application.

B.17 Permit Amendment or Revision [326 IAC 2-8-10] [326 IAC 2-8-11.1]

(a) Permit amendments and revisions are governed by the requirements of 326 IAC 2-8-10 or 326 IAC 2-8-11.1 whenever the Permittee seeks to amend or modify this permit.

(b) Any application requesting an amendment or modification of this permit shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality

100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

Any such application shall be certified by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement the administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

(d) No permit amendment or modification is required for the addition, operation or removal of a nonroad engine, as defined in 40 CFR 89.2.

B.18 Operational Flexibility [326 IAC 2-8-15] [326 IAC 2-8-11.1]

(a) The Permittee may make any change or changes at this source that are described in 326 IAC 2-8-15(b) through (d), without prior permit revision, if each of the following conditions is met:

(1) The changes are not modifications under any provision of Title I of the Clean Air Act;

(2) Any approval required by 326 IAC 2-8-11.1 has been obtained;

(3) The changes do not result in emissions which exceed the emissions allowable under this permit (whether expressed herein as a rate of emissions or in terms of total emissions);

(4) The Permittee notifies the:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

and

United States Environmental Protection Agency, Region V
Air and Radiation Division, Regulation Development Branch - Indiana (AR-18J)
77 West Jackson Boulevard
Chicago, Illinois 60604-3590

in advance of the change by written notification at least ten (10) days in advance of the proposed change. The Permittee shall attach every such notice to the Permittee's copy of this permit; and

(5) The Permittee maintains records on-site which document, on a rolling five (5) year basis, all such changes and emissions trading that are subject to 326 IAC 2-8-15(b) through (d) and makes such records available, upon reasonable request, to public review.

Such records shall consist of all information required to be submitted to IDEM, OAQ, in the notices specified in 326 IAC 2-8-15(b)(2), (c)(1), and (d).

(b) Emission Trades [326 IAC 2-8-15(c)]

The Permittee may trade increases and decreases in emissions in the source, where the applicable SIP provides for such emission trades without requiring a permit revision, subject to the constraints of Section (a) of this condition and those in 326 IAC 2-8-15(c).

(c) Alternative Operating Scenarios [326 IAC 2-8-15(d)]
The Permittee may make changes at the source within the range of alternative operating scenarios that are described in the terms and conditions of this permit in accordance with 326 IAC 2-8-4(7). No prior notification of IDEM, OAQ or U.S. EPA is required.

B.19 Permit Revision Requirement [326 IAC 2-8-11.1]

A modification, construction, or reconstruction is governed by the requirements of 326 IAC 2 and 326 IAC 2-8-11.1.

B.20 Inspection and Entry [326 IAC 2-8-5(a)(2)] [IC 13-14-2-2] [IC 13-30-3-1] [IC 13-17-3-2]

Upon presentation of proper identification cards, credentials, and other documents as may be required by law, and subject to the Permittee's right under all applicable laws and regulations to assert that the information collected by the agency is confidential and entitled to be treated as such, the Permittee shall allow IDEM, OAQ, U.S. EPA, or an authorized representative to perform the following:

(a) Enter upon the Permittee's premises where a FESOP source is located, or emissions related activity is conducted, or where records must be kept under the conditions of this permit;

(b) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;

(c) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, inspect at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit;

(d) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or applicable requirements; and

(e) As authorized by the Clean Air Act, IC 13-14-2-2, IC 13-17-3-2, and IC 13-30-3-1, utilize any photographic, recording, testing, monitoring, or other equipment for the purpose of assuring compliance with this permit or applicable requirements.

B.21 Transfer of Ownership or Operational Control [326 IAC 2-8-10]

(a) The Permittee must comply with the requirements of 326 IAC 2-8-10 whenever the Permittee seeks to change the ownership or operational control of the source and no other change in the permit is necessary.

(b) Any application requesting a change in the ownership or operational control of the source shall contain a written agreement containing a specific date for transfer of permit responsibility, coverage and liability between the current and new Permittee. The application shall be submitted to:

Indiana Department of Environmental Management
Permits Branch, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The application which shall be submitted by the Permittee does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(c) The Permittee may implement administrative amendment changes addressed in the request for an administrative amendment immediately upon submittal of the request. [326 IAC 2-8-10(b)(3)]

B.22 Annual Fee Payment [326 IAC 2-7-19] [326 IAC 2-8-4(6)] [326 IAC 2-8-16][326 IAC 2-1.1-7]

(a) The Permittee shall pay annual fees to IDEM, OAQ, within thirty (30) calendar days of receipt of a billing. Pursuant to 326 IAC 2-7-19(b), if the Permittee does not receive a bill from IDEM, OAQ the applicable fee is due April 1 of each year.

(b) Failure to pay may result in administrative enforcement action, or revocation of this permit.

(c) The Permittee may call the following telephone numbers: 1-800-451-6027 or 317-233-4320 (ask for OAQ, I/M & Billing Section), to determine the appropriate permit fee.

SECTION C SOURCE OPERATION CONDITIONS

Entire Source

Emissions Limitations and Standards [326 IAC 2-8-4(1)]

C.1 Overall Source Limit [326 IAC 2-8]

The purpose of this permit is to limit this source's potential to emit to less than major source levels for the purpose of Section 502(a) of the Clean Air Act.

(a) Pursuant to 326 IAC 2-8:

(1) The potential to emit any regulated pollutant, except particulate matter (PM), from the entire source shall be limited to less than one-hundred (100) tons per twelve (12) consecutive month period. This limitation shall also make the requirements of 326 IAC 2-2 (PSD) not applicable;

(2) The potential to emit any individual hazardous air pollutant (HAP) from the entire source shall be limited to less than ten (10) tons per twelve (12) consecutive month period; and

(3) The potential to emit any combination of HAPs from the entire source shall be limited to less than twenty-five (25) tons per twelve (12) consecutive month period.

(b) Pursuant to 326 IAC 2-2 (Prevention of Significant Deterioration (PSD)), potential to emit particulate matter (PM) from the entire source shall be limited to less than two hundred fifty (250) tons per twelve (12) consecutive month period.

(c) This condition shall include all emission points at this source including those that are insignificant as defined in 326 IAC 2-7-1(21). The source shall be allowed to add insignificant activities not already listed in this permit, provided the source's potential to emit does not exceed the above specified limits.

(d) Section D of this permit contains independently enforceable provisions to satisfy this requirement.

C.2 Opacity [326 IAC 5-1]

Pursuant to 326 IAC 5-1-2 (Opacity Limitations), except as provided in 326 IAC 5-1-3 (Temporary Alternative Opacity Limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Opacity shall not exceed an average of thirty percent (30%) in any one (1) six (6) minute averaging period as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

C.3 Open Burning [326 IAC 4-1] [IC 13-17-9]

The Permittee shall not open burn any material except as provided in 326 IAC 4-1-3, 326 IAC 4-1-4 or 326 IAC 4-1-6. The previous sentence notwithstanding, the Permittee may open burn in accordance with an open burning approval issued by the Commissioner under 326 IAC 4-1-4.1.

C.4 Incineration [326 IAC 4-2] [326 IAC 9-1-2(3)]

The Permittee shall not operate an incinerator or incinerate any waste or refuse except as provided in 326 IAC 4-2 and in 326 IAC 9-1-2.

C.5 Fugitive Dust Emissions [326 IAC 6-4]

The Permittee shall not allow fugitive dust to escape beyond the property line or boundaries of the property, right-of-way, or easement on which the source is located, in a manner that would violate 326 IAC 6-4 (Fugitive Dust Emissions).

C.6 Operation of Equipment [326 IAC 2-8-5(a)(4)]

Except as otherwise provided by statute, rule or in this permit, all air pollution control equipment listed in this permit and used to comply with an applicable requirement shall be operated at all times that the emission units vented to the control equipment are in operation.

C.7 Stack Height [326 IAC 1-7]

The Permittee shall comply with the applicable provisions of 326 IAC 1-7 (Stack Height Provisions), for all exhaust stacks through which a potential (before controls) of twenty-five (25) tons per year or more of particulate matter or sulfur dioxide is emitted.

C.8 Asbestos Abatement Projects [326 IAC 14-10] [326 IAC 18] [40 CFR 61, Subpart M]

(a) Notification requirements apply to each owner or operator. If the combined amount of regulated asbestos containing material (RACM) to be stripped, removed or disturbed is at least 260 linear feet on pipes or 160 square feet on other facility components, or at least thirty-five (35) cubic feet on all facility components, then the notification requirements of 326 IAC 14-10-3 are mandatory. All demolition projects require notification whether or not asbestos is present.

(b) The Permittee shall ensure that a written notification is sent on a form provided by the Commissioner at least ten (10) working days before asbestos stripping or removal work or before demolition begins, per 326 IAC 14-10-3, and shall update such notice as necessary, including, but not limited to the following:

(1) When the amount of affected asbestos containing material increases or decreases by at least twenty percent (20%); or

(2) If there is a change in the following:

(A) Asbestos removal or demolition start date;

(B) Removal or demolition contractor; or

(C) Waste disposal site.

(c) The Permittee shall ensure that the notice is postmarked or delivered according to the guidelines set forth in 326 IAC 14-10-3(2).

(d) The notice to be submitted shall include the information enumerated in 326 IAC 14-10-3(3).

All required notifications shall be submitted to:

Indiana Department of Environmental Management
Asbestos Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015

Indianapolis, Indiana 46206-6015

The notice shall include a signed certification from the owner or operator that the information provided in this notification is correct and that only Indiana licensed workers and project supervisors will be used to implement the asbestos removal project. The notifications do not require a certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) Procedures for Asbestos Emission Control

The Permittee shall comply with the applicable emission control procedures in 326 IAC 14-10-4 and 40 CFR 61.145(c). Per 326 IAC 14-10-1 emission control requirements are applicable for any removal or disturbance of RACM greater than three (3) linear feet on pipes or three (3) square feet on any other facility components or a total of at least 0.75 cubic feet on all facility components.

(f) Demolition and renovation

The Permittee shall thoroughly inspect the affected facility or part of the facility where the demolition or renovation will occur for the presence of asbestos pursuant to 40 CFR 61.145(a).

(g) Indiana Accredited Asbestos Inspector

The Permittee shall comply with 326 IAC 14-10-1(a) that requires the owner or operator, prior to a renovation/demolition, to use an Indiana Accredited Asbestos Inspector to thoroughly inspect the affected portion of the facility for the presence of asbestos. The requirement to use an Indiana Accredited Asbestos inspector is not federally enforceable.

Testing Requirements [326 IAC 2-8-4(3)]

C.9 Performance Testing [326 IAC 3-6]

(a) All testing shall be performed according to the provisions of 326 IAC 3-6 (Source Sampling Procedures), except as provided elsewhere in this permit, utilizing any applicable procedures and analysis methods specified in 40 CFR 51, 40 CFR 60, 40 CFR 61, 40 CFR 63, 40 CFR 75, or other procedures approved by IDEM, OAQ.

A test protocol, except as provided elsewhere in this permit, shall be submitted to:

Indiana Department of Environmental Management
Compliance Data Section, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

no later than thirty-five (35) days prior to the intended test date. The protocol submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(b) The Permittee shall notify IDEM, OAQ of the actual test date at least fourteen (14) days prior to the actual test date. The notification submitted by the Permittee does not require certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

(c) Pursuant to 326 IAC 3-6-4(b), all test reports must be received by IDEM, OAQ not later than forty-five (45) days after the completion of the testing. An extension may be granted by IDEM, OAQ, if the source submits to IDEM, OAQ, a reasonable written explanation not later than five (5) days prior to the end of the initial forty-five (45) day period.

Compliance Requirements [326 IAC 2-1.1-11]

C.10 Compliance Requirements [326 IAC 2-1.1-11]

The commissioner may require stack testing, monitoring, or reporting at any time to assure compliance with all applicable requirements by issuing an order under 326 IAC 2-1.1-11. Any monitoring or testing shall be performed in accordance with 326 IAC 3 or other methods approved by the commissioner or the U.S. EPA.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.11 Compliance Monitoring [326 IAC 2-8-4(3)] [326 IAC 2-8-5(a)(1)]

Unless otherwise specified in this permit, all monitoring and record keeping requirements not already legally required shall be implemented upon issuance of this permit. If required by Section D, the Permittee shall be responsible for installing any necessary equipment and initiating any required monitoring related to that equipment.

Unless otherwise specified in the approval for the new emissions unit, compliance monitoring for new emission units or emission units added through a permit revision shall be implemented when operation begins.

C.12 Monitoring Methods [326 IAC 3] [40 CFR 60] [40 CFR 63]

Any monitoring or testing performed required by Section D of this permit shall be performed according to the provisions of 326 IAC 3, 40 CFR 60, Appendix A, 40 CFR 60 Appendix B, 40 CFR 63 or other approved methods as specified in this permit.

Corrective Actions and Response Steps [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

C.13 Emergency Reduction Plans [326 IAC 1-5-2] [326 IAC 1-5-3]

Pursuant to 326 IAC 1-5-2 (Emergency Reduction Plans; Submission):

(a) The Permittee prepared and submitted written emergency reduction plans (ERPs) consistent with safe operating procedures on June 4, 2001.

(b) Upon direct notification by IDEM, OAQ that a specific air pollution episode level is in effect, the Permittee shall immediately put into effect the actions stipulated in the approved ERP for the appropriate episode level. [326 IAC 1-5-3]

C.14 Risk Management Plan [326 IAC 2-8-4] [40 CFR 68]

If a regulated substance, as defined in 40 CFR 68, is present at a source in more than a threshold quantity, the source must comply with the applicable requirements of 40 CFR 68.

C.15 Compliance Response Plan - Preparation, Implementation, Records, and Reports [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) The Permittee is required to prepare a Compliance Response Plan (CRP) for each compliance monitoring condition of this permit. A CRP shall be submitted to IDEM, OAQ upon request. The CRP shall be prepared within ninety (90) days after issuance of this permit by the Permittee, supplemented from time to time by the Permittee, maintained on site, and is comprised of:

(1) Reasonable response steps that may be implemented in the event that a response step is needed pursuant to the requirements of Section D of this permit; and an expected time frame for taking reasonable response steps.

(2) If, at any time, the Permittee takes reasonable response steps that are not set forth

in the Permittee's current Compliance Response Plan and the Permittee documents such response in accordance with subsection (e) below, the Permittee shall amend its Compliance Response Plan to include such response steps taken.

(b) For each compliance monitoring condition of this permit, reasonable response steps shall be taken when indicated by the provisions of that compliance monitoring condition as follows:

(1) Reasonable response steps shall be taken as set forth in the Permittee's current Compliance Response Plan; or

(2) If none of the reasonable response steps listed in the Compliance Response Plan is applicable or responsive to the excursion, the Permittee shall devise and implement additional response steps as expeditiously as practical. Taking such additional response steps shall not be considered a deviation from this permit so long as the Permittee documents such response steps in accordance with this condition.

(3) If the Permittee determines that additional response steps would necessitate that the emissions unit or control device be shut down, and it will be 10 days or more until the unit or device will be shut down, then the permittee shall promptly notify the IDEM, OAQ of the expected date of the shut down, the status of the applicable compliance monitoring parameter with respect to normal, and the results of the actions taken up to the time of notification.

(4) Failure to take reasonable response steps shall be considered a deviation from the permit.

(c) The Permittee is not required to take any further response steps for any of the following reasons:

(1) A false reading occurs due to the malfunction of the monitoring equipment and prompt action was taken to correct the monitoring equipment.

(2) The Permittee has determined that the compliance monitoring parameters established in the permit conditions are technically inappropriate, has previously submitted a request for an administrative amendment to the permit, and such request has not been denied.

(3) An automatic measurement was taken when the process was not operating.

(4) The process has already returned or is returning to operating within "normal" parameters and no response steps are required.

(d) When implementing reasonable steps in response to a compliance monitoring condition, if the Permittee determines that an exceedance of an emission limitation has occurred, the Permittee shall report such deviations pursuant to Section B-Deviations from Permit Requirements and Conditions.

(e) The Permittee shall record all instances when, in accordance with Section D, response steps are taken. In the event of an emergency, the provisions of 326 IAC 2-8-12 (Emergency Provisions) requiring prompt corrective action to mitigate emissions shall prevail.

(f) Except as otherwise provided by a rule or provided specifically in Section D, all monitoring as

required in Section D shall be performed when the emission unit is operating, except for time necessary to perform quality assurance and maintenance activities.

C.16 Actions Related to Noncompliance Demonstrated by a Stack Test [326 IAC 2-8-4] [326 IAC 2-8-5]

(a) When the results of a stack test performed in conformance with Section C - Performance Testing, of this permit exceed the level specified in any condition of this permit, the Permittee shall take appropriate response actions. The Permittee shall submit a description of these response actions to IDEM, OAQ, within thirty (30) days of receipt of the test results. The Permittee shall take appropriate action to minimize excess emissions from the affected facility while the response actions are being implemented.

(b) A retest to demonstrate compliance shall be performed within one hundred twenty (120) days of receipt of the original test results. Should the Permittee demonstrate to IDEM, OAQ that retesting in one-hundred and twenty (120) days is not practicable, IDEM, OAQ may extend the retesting deadline.

(c) IDEM, OAQ reserves the authority to take any actions allowed under law in response to noncompliant stack tests.

The response action documents submitted pursuant to this condition do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)]

C.17 Emission Statement [326 IAC 2-6] [326 IAC 2-8-4(3)]

(a) The Permittee shall submit an emission statement certified pursuant to the requirements of 326 IAC 2-6. This statement must be received in accordance with the compliance schedule specified in 326 IAC 2-6-3 and must comply with the minimum requirements specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8). The statement must be submitted to:

Indiana Department of Environmental Management
Technical Support and Modeling Section, Office of Air Quality
100 North Senate Avenue, P.O. Box 6015
Indianapolis, Indiana 46206-6015

The emission statement does require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The emission statement required by this permit shall be considered timely if the date post-marked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ, on or before the date it is due.

C.18 General Record Keeping Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-5]

(a) Records of all required monitoring data, reports and support information required by this permit shall be retained for a period of at least five (5) years from the date of monitoring sample, measurement, report, or application. These records shall be physically present or electronically accessible at the source location for a minimum of three (3) years. The records may be stored elsewhere for the remaining two (2) years as long as they are available upon request. If the Commissioner makes a request for records to the Permittee, the Permittee

shall furnish the records to the Commissioner within a reasonable time.

(b) Unless otherwise specified in this permit, all record keeping requirements not already legally required shall be implemented within ninety (90) days of permit issuance.

C.19 General Reporting Requirements [326 IAC 2-8-4(3)(C)] [326 IAC 2-1.1-11]

(a) The source shall submit the attached Quarterly Deviation and Compliance Monitoring Report or its equivalent. Any deviation from permit requirements, the date(s) of each deviation, the cause of the deviation, and the response steps taken must be reported. This report shall be submitted within thirty (30) days of the end of the reporting period. The Quarterly Deviation and Compliance Monitoring Report shall include the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(b) The report required in (a) of this condition and reports required by conditions in Section D of this permit shall be submitted to:

Indiana Department of Environmental Management
Compliance Branch, Office of Air Quality
100 North Senate Avenue, P. O. Box 6015
Indianapolis, Indiana 46206-6015

(c) Unless otherwise specified in this permit, any notice, report, or other submission required by this permit shall be considered timely if the date postmarked on the envelope or certified mail receipt, or affixed by the shipper on the private shipping receipt, is on or before the date it is due. If the document is submitted by any other means, it shall be considered timely if received by IDEM, OAQ on or before the date it is due.

(d) Unless otherwise specified in this permit, all reports required in Section D of this permit shall be submitted within thirty (30) days of the end of the reporting period. All reports do require the certification by the "authorized individual" as defined by 326 IAC 2-1.1-1(1).

(e) The first report covered the period commencing on the date of issuance of the original FESOP and ended on the last day of the reporting period. All subsequent reporting periods shall be based on calendar years.

Stratospheric Ozone Protection

C.20 Compliance with 40 CFR 82 and 326 IAC 22-1

Pursuant to 40 CFR 82 (Protection of Stratospheric Ozone), Subpart F, except as provided for motor vehicle air conditioners in Subpart B, the Permittee shall comply with the standards for recycling and emissions reduction:

(a) Persons opening appliances for maintenance, service, repair or disposal must comply with the required practices pursuant to 40 CFR 82.156

(b) Equipment used during the maintenance, service, repair or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to 40 CFR 82.158.

(c) Persons performing maintenance, service, repair or disposal of appliances must be certified by an approved technician certification program pursuant to 40 CFR 82.161.

SECTION D.1 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Machining and Woodworking

(a) Machining and woodworking equipment, with units constructed between 1971 and 1995, including saws, routers, sanders, planers, one (1) edge bander, one (1) profiler, one (1) panel saw, hardware assembly, and a wood chipper, with a maximum capacity of 15,000 pounds of raw materials per hour, controlled by a cyclone/baghouse system (DC1), and exhausting to stack DCX, with captured sawdust conveyed to a storage bin.

(b) Machining and woodworking equipment, constructed in 2003, including one (1) single sided edge bander, one (1) sander planer, one (1) straight line rip saw and one (1) KVAL D1 line, equipped with a single baghouse dust collector (DC2) and exhausting to stack DCX, with captured saw dust conveyed to a storage bin, capacity: 18,700 pounds of raw materials (wood and plastic) per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.1.1 Particulate Matter (PM) Limitations [326 IAC 6-1] [326 IAC 2-2]

(a) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the machining and woodworking equipment exhausting to cyclone/ baghouse DC1 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

(b) Pursuant to 326 IAC 6-1-2(a) (Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

(c) The flow rate at the machining and woodworking equipment exhausting to cyclone/baghouse DC1 shall not exceed 60,677 dry standard cubic feet and the flow rate at the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall not exceed 46,760 dry standard cubic feet. These limitations, in conjunction with the limitations in (a) and (b) of this condition, shall limit the potential to emit PM to 27.6 pounds per hour, equivalent to 121 tons per year from the machining and woodworking operations, and less than 250 tons per year from the entire source. Therefore, the requirements of 326 IAC 2-2 are not applicable.

D.1.2 FESOP and PSD Minor Limit [326 IAC 2-8-4] [326 IAC 2-2]

(a) The potential to emit PM_{10} from the machining and woodworking equipment exhausting to cyclone/ baghouse DC1 shall not exceed 1.21 pounds per ton of raw materials throughput. This will limit the potential to emit PM_{10} to less than 40.0 tons per year, when operating at the maximum raw material throughput rate of 15,000 pounds per hour.

(b) The potential to emit PM_{10} from the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall not exceed 1.22 pounds per ton of raw materials throughput. This will limit the potential to emit PM_{10} to less than 50.0 tons per year, when operating at the maximum raw material throughput rate of 18,700 pounds per hour.

These limitations, in conjunction with Condition D.2.3, will limit the potential to emit PM_{10} to less than 100 tons per year, including 2.00 tons per year from insignificant activities. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable. These limitations will also make the requirements of 326

IAC 2-2, PSD, not applicable.

D.1.3 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and their control devices.

Compliance Determination Requirements

D.1.4 Particulate Control

(a) Pursuant to CP 141-2833-00058, issued on January 11, 1993, and in order to comply with Conditions D.1.1 and D.1.2, the cyclone/baghouse system (DC1) for particulate control shall be in operation and control emissions from the machining and woodworking at all times when the machining or woodworking equipment exhausting to that cyclone/baghouse system is in operation and exhausting to the outside atmosphere.

(b) Pursuant to Significant Source Modification 141-17748, issued on October 16, 2003, and in order to comply with Conditions D.1.1 and D.1.2, the baghouse dust collector (DC2) for particulate control shall be in operation and control emissions from the machining and wood-working at all times when the machining or woodworking equipment exhausting to that baghouse is in operation and exhausting to the outside atmosphere.

D.1.5 Testing Requirements [326 IAC 2-8-5(a)(1),(4)] [326 IAC 2-1.1-11]

Within one hundred and eighty (180) days after initial startup, in order to demonstrate compliance with Conditions D.1.1 and D.1.2, the Permittee shall perform PM and PM_{10} testing for the machining and woodworking equipment exhausting to baghouse dust collector DC2 utilizing methods as approved by the Commissioner. PM_{10} includes filterable and condensible PM_{10}. Testing shall be conducted in accordance with Section C- Performance Testing.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.1.6 Visible Emissions Notations

(a) Daily visible emission notations of the machining and woodworking stack (DCX) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal.

(b) For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time.

(c) In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions.

(d) A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process.

(e) The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

D.1.7 Baghouse Inspections

An inspection shall be performed each calendar quarter of all bags controlling the machining and woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed

within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

D.1.8 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(b) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.1.9 Record Keeping Requirements

(a) To document compliance with Condition D.1.6, the Permittee shall maintain records of visible emission notations of the machining and woodworking stack (DCX) exhaust once per shift.

(b) To document compliance with Condition D.1.3, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(c) To document compliance with Condition D.1.7, the Permittee shall maintain records of the results of the inspections required under Condition D.1.7 and the dates vents are redirected.

(d) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

SECTION D.2 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Spray Booths

(c) One (1) two-stage spray booth, identified as AB, reconstructed in 1998, utilizing a high volume low pressure (HVLP) application system, with overspray controlled by dry filters, and exhausting to either stack A or B, maximum capacity: 103 wood doors per hour.

(d) One (1) spray booth, identified as C, constructed in 1984, utilizing a high volume low pressure (HVLP) application system, with overspray controlled by dry filters, and exhausting to stack C, maximum capacity: 103 wood doors per hour.

(e) One (1) spray booth, identified as D, constructed in 1994, utilizing a high volume low pressure (HVLP) application system, with overspray controlled by dry filters, and exhausting to stack D, maximum capacity: 103 wood doors per hour.

(f) One (1) spray booth, identified as E, constructed in 1999, utilizing a high volume low pressure (HVLP) application system with overspray controlled by dry filters and exhausting to stack E, maximum capacity: 103 wood doors per hour.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.2.1 Volatile Organic Compounds (VOC) [326 IAC 8-1-6]

Any change or modification which increases the potential VOC emissions from any of the four (4) spray booths (AB, C, D or E) to twenty-five (25) tons per year or more, may cause that booth to become subject to 326 IAC 8-1-6 and shall require prior IDEM, OAQ, approval.

D.2.2 FESOP Minor Limit [326 IAC 2-8-4]

The use of each individual HAP, including HAPs from coatings, dilution solvents, and cleaning solvents, at the four (4) spray booths, identified as AB, C, D and E, shall be limited to 9.97 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the use of any combination of HAPs, including HAPs from coatings, dilution solvents, and cleaning solvents, at the three (3) spray booths shall be limited to 24.9 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. The unrestricted potential individual organic HAP emissions from the total of all insignificant activities is 0.028 tons per year, and the total HAP emissions from the total of all insignificant activities is 0.028 tons per year. This will limit the total source potential to emit each individual HAP to less than ten (10) tons per year, and the potential to emit total HAPs to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable.

D.2.3 PSD and FESOP Minor Limit [326 IAC 2-8-4]

Any change or modification that increases the solids delivered to the applicators at the four (4) spray booths, identified as AB, C, D and E, to more than 333 tons per consecutive twelve (12) month period, total, will increase the potential to emit PM and PM_{10} from the four (4) spray booths to 8.00 tons per year or more based on a seventy percent (70%) transfer efficiency and a dry filter control efficiency of ninety-two percent (92%). Such change or modification would increase the PM and PM_{10} emissions to 100 and 250 tons per year or more, respectively, from the entire source and may cause the source to become subject to 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD. Therefore, the Permittee shall

obtain prior IDEM, OAQ, approval before such change or modification may occur.

D.2.4 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the surface coating facilities shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

D.2.5 Preventive Maintenance Plan [326 IAC 2-8-4(9)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for these facilities and any control devices.

Compliance Determination Requirements

D.2.6 Volatile Organic Compounds (VOC) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the VOC usage limitations contained in Condition D.2.1 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" VOC data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.7 Hazardous Air Pollutants (HAPs) [326 IAC 8-1-2] [326 IAC 8-1-4]

Compliance with the HAPs usage limitations contained in Condition D.2.2 shall be determined pursuant to 326 IAC 8-1-4(a)(3) and 326 IAC 8-1-2(a) by preparing or obtaining from the manufacturer the copies of the "as supplied" and "as applied" HAP data sheets. IDEM, OAQ, reserves the authority to determine compliance using Method 24 in conjunction with the analytical procedures specified in 326 IAC 8-1-4.

D.2.8 Particulate Control

In order to comply with Conditions D.2.3 and D.2.4, the dry filters for particulate control shall be in operation and control emissions from the four (4) spray booths, identified as AB, C, D and E at all times that the spray booths are in operation.

Compliance Monitoring Requirements [326 IAC 2-8-4] [326 IAC 2-8-5(a)(1)]

D.2.9 Monitoring

(a) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (A, B, C, D and E) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(b) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(c) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

Record Keeping and Reporting Requirements [326 IAC 2-8-4(3)] [326 IAC 2-8-16]

D.2.10 Record Keeping Requirements

(a) To document compliance with Condition D.2.1, the Permittee shall maintain records in accordance with (1) through (5) below. Records maintained for (1) through (5) shall be taken monthly and shall be complete and sufficient to establish compliance with the VOC emission limits established in Condition D.2.1. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The VOC content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The cleanup solvent usage for each month;

(4) The total VOC usage for each month; and

(5) The weight of VOCs emitted for each compliance period.

(b) To document compliance with Condition D.2.2, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the HAP usage limits established in Condition D.2.2. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The individual and total HAP content of each coating material and solvent used.

(2) The amount of coating material and solvent less water used on a monthly basis.

(A) Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(B) Solvent usage records shall differentiate between those added to coatings and those used as cleanup solvents.

(3) The individual and total HAP usage for each month; and

(4) The weight of each individual HAP and total HAPs emitted for each compliance period.

(c) To document compliance with Condition D.2.3, the Permittee shall maintain records in accordance with (1) through (4) below. Records maintained for (1) through (4) shall be taken monthly and shall be complete and sufficient to establish compliance with the solids usage

limit established in Condition D.2.3. Records necessary to demonstrate compliance shall be available within 30 days of the end of each compliance period.

(1) The solids content of each coating material and solvent used.

(2) The amount of coating material used on a monthly basis. Records shall include purchase orders, invoices, and material safety data sheets (MSDS) necessary to verify the type and amount used.

(3) The total solids usage for each month; and

(4) The weight of solids (PM and PM_{10}) emitted for each compliance period.

(d) To document compliance with Condition D.2.9, the Permittee shall maintain a log of weekly overspray observations, and daily and monthly inspections,.

(e) To document compliance with Condition D.2.5, the Permittee shall maintain records of any additional inspections prescribed by the Preventive Maintenance Plan.

(f) All records shall be maintained in accordance with Section C - General Record Keeping Requirements, of this permit.

D.2.11 Reporting Requirements

A quarterly summary of the information to document compliance with Condition D.2.2 shall be submitted to the address listed in Section C - General Reporting Requirements, of this permit, using the reporting forms located at the end of this permit, or their equivalent, within thirty (30) days after the end of the quarter being reported. The report submitted by the Permittee does require the certification by the “authorized individual” as defined by 326 IAC 2-1.1-1(1).

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-8-4(10)]: Insignificant Activities

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

(1) One (1) natural gas fired heater, capacity: 1.7 million British thermal units per hour.

(2) Three (3) natural gas fired forced air systems, capacity: 0.58 million British thermal units per hour, each.

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone (Table saw equipped with a self contained vacuum drum).

(c) Closed loop heating and cooling systems.

(d) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-8-4(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-1-2]

Pursuant to 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate matter (PM) emissions from the trimmers and natural gas combustion units shall be limited to 0.03 grain per dry standard cubic foot of exhaust air.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP) CERTIFICATION

Source Name: Mohawk Flush Doors, Inc.
Source Address: 402 N. Sheridan, South Bend, Indiana 46619
Mailing Address: 402 N. Sheridan, South Bend, Indiana 46619
FESOP No.: F 141-17223-00058

This certification shall be included when submitting monitoring, testing reports/results or other documents as required by this permit.

Please check what document is being certified:

9 Annual Compliance Certification Letter

9 Test Result (specify) _____

9 Report (specify) _____

9 Notification (specify) _____

9 Affidavit (specify) _____

9 Other (specify) _____

I certify that, based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete.
Signature:
Printed Name:
Title/Position:
Phone:
Date:

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY

COMPLIANCE BRANCH
100 North Senate Avenue
P.O. Box 6015
Indianapolis, Indiana 46206-6015
Phone: 317-233-5674
Fax: 317-233-5967

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
EMERGENCY OCCURRENCE REPORT

Source Name: Mohawk Flush Doors, Inc.
Source Address: 402 N. Sheridan, South Bend, Indiana 46619
Mailing Address: 402 N. Sheridan, South Bend, Indiana 46619
FESOP No.: F 141-17223-00058

This form consists of 2 pages **Page 1 of 2**

9 This is an emergency as defined in 326 IAC 2-7-1(12)

- The Permittee must notify the Office of Air Quality (OAQ), within four (**4**) business hours (1-800-451-6027 or 317-233-5674, ask for Compliance Section); and
- The Permittee must submit notice in writing or by facsimile within two (**2**) working days (Facsimile Number: 317-233-5967), and follow the other requirements of 326 IAC 2-7-16

If any of the following are not applicable, mark N/A

Facility/Equipment/Operation:
Control Equipment:
Permit Condition or Operation Limitation in Permit:
Description of the Emergency:
Describe the cause of the Emergency:

If any of the following are not applicable, mark N/A **Page 2 of 2**

Date/Time Emergency started:
Date/Time Emergency was corrected:
Was the facility being properly operated at the time of the emergency? Y N Describe:
Type of Pollutants Emitted: TSP, PM_{10}, SO_2, VOC, NO_X, CO, Pb, other:
Estimated amount of pollutant(s) emitted during emergency:
Describe the steps taken to mitigate the problem:
Describe the corrective actions/response steps taken:
Describe the measures taken to minimize emissions:
If applicable, describe the reasons why continued operation of the facilities are necessary to prevent imminent injury to persons, severe damage to equipment, substantial loss of capital investment, or loss of product or raw materials of substantial economic value:

Form Completed by: _____

Title / Position: _____

Date: _____

Phone: _____

A certification is not required for this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Mohawk Flush Doors, Inc.
Source Address: 402 N. Sheridan, South Bend, Indiana 46619
Mailing Address: 402 N. Sheridan, South Bend, Indiana 46619
FESOP No.: F 141-17223-00058
Facility: Four (4) spray booths (AB, C, D and E)
Parameter: Individual HAP usage
Limit: 9.97 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, equivalent to less than 9.97 tons of any individual HAP per year

YEAR: _____

Month	Individual HAP Usage (tons)	Individual HAP Usage (tons)	Individual HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FESOP Quarterly Report

Source Name: Mohawk Flush Doors, Inc.
Source Address: 402 N. Sheridan, South Bend, Indiana 46619
Mailing Address: 402 N. Sheridan, South Bend, Indiana 46619
FESOP No.: F 141-17223-00058
Facility: Four (4) spray booths (AB, C, D and E)
Parameter: Total HAP usage
Limit: 24.9 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, equivalent to less than 24.9 tons of any total HAPs per year

YEAR: _____

Month	Total HAP Usage (tons)	Total HAP Usage (tons)	Total HAP Usage (tons)
	This Month	Previous 11 Months	12 Month Total

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Submitted by: _____

Title / Position: _____

Signature: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR QUALITY
COMPLIANCE DATA SECTION

FEDERALLY ENFORCEABLE STATE OPERATING PERMIT (FESOP)
QUARTERLY DEVIATION AND COMPLIANCE MONITORING REPORT

Source Name: Mohawk Flush Doors, Inc.
Source Address: 402 N. Sheridan, South Bend, Indiana 46619
Mailing Address: 402 N. Sheridan, South Bend, Indiana 46619
FESOP No.: F 141-17223-00058

Months: _____ **to** _____ **Year:** _____

This report shall be submitted quarterly based on a calendar year. Any deviation from the requirements, the date(s) of each deviation, the probable cause of the deviation, and the response steps taken must be reported. Deviations that are required to be reported by an applicable requirement shall be reported according to the schedule stated in the applicable requirement and do not need to be included in this report. Additional pages may be attached if necessary. If no deviations occurred, please specify in the box marked "No deviations occurred this reporting period".

9 NO DEVIATIONS OCCURRED THIS REPORTING PERIOD.

9 THE FOLLOWING DEVIATIONS OCCURRED THIS REPORTING PERIOD

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	
Permit Requirement (specify permit condition #)	
Date of Deviation:	**Duration of Deviation:**
Number of Deviations:	
Probable Cause of Deviation:	
Response Steps Taken:	

9 No deviation occurred in this quarter.

9 Deviation/s occurred in this quarter.
Deviation has been reported on: _____

Form Completed By: _____

Title/Position: _____

Date: _____

Phone: _____

Attach a signed certification to complete this report.

Indiana Department of Environmental Management
Office of Air Quality

Technical Support Document (TSD)
for a Federally Enforceable State Operating Permit (FESOP)

Source Background and Description

Source Name:	**Mohawk Flush Doors, Inc.**
Source Location:	**402 N. Sheridan, South Bend, Indiana 46619**
County:	**St. Joseph**
SIC Code:	**2431**
Operation Permit No.:	**F 141-17223-00058**
Permit Reviewer:	**CarrieAnn Paukowits**

The Office of Air Quality (OAQ) has reviewed a FESOP application from Mohawk Flush Doors, Inc. relating to the operation of a stationary wood door manufacturing plant.

A Part 70 Operating Permit (T141-7805-00058) was issued to this source on November 17, 1998. IDEM, OAQ, received a Part 70 Renewal application from the Permittee on February 17, 2003. On September 10, 2003, the applicant requested a FESOP rather than a Part 70 permit renewal. The source must continue to comply with the requirements of T 141-7805-00058 and all amendments and modification listed in the *Existing Approvals* section of this document until the FESOP is issued.

This permit contains provisions intended to satisfy the requirements of the construction permit rules.

Permitted Emission Units and Pollution Control Equipment

The source consists of the following permitted emission units and pollution control devices:

(a) Machining and woodworking equipment, with units constructed between 1971 and 1995, including saws, routers, sanders, planers, one (1) edge bander, one (1) profiler, one (1) panel saw, hardware assembly, and a wood chipper, with a maximum capacity of 15,000 pounds of raw materials per hour, controlled by a cyclone/baghouse system (DC1), and exhausting to stack DCX, with captured sawdust conveyed to a storage bin.

(b) Machining and woodworking equipment, constructed in 2003, including one (1) single sided edge bander, one (1) sander planer, one (1) straight line rip saw and one (1) KVAL D1 line, equipped with a single baghouse dust collector (DC2) and exhausting to stack DCX, with captured saw dust conveyed to a storage bin, capacity: 18,700 pounds of raw materials (wood and plastic) per hour.

(c) One (1) two-stage spray booth, identified as AB, reconstructed in 1998, utilizing a high volume low pressure (HVLP) application system, with overspray controlled by dry filters, and

exhausting to either stack A or B, maximum capacity: 103 wood doors per hour.

(d) One (1) spray booth, identified as C, constructed in 1984, utilizing a high volume low pressure (HVLP) application system, with overspray controlled by dry filters, and exhausting to stack C, maximum capacity: 103 wood doors per hour.

(e) One (1) spray booth, identified as D, constructed in 1994, utilizing a high volume low pressure (HVLP) application system, with overspray controlled by dry filters, and exhausting to stack D, maximum capacity: 103 wood doors per hour.

(f) One (1) spray booth, identified as E, constructed in 1999, utilizing a high volume low pressure (HVLP) application system with overspray controlled by dry filters and exhausting to stack E, maximum capacity: 103 wood doors per hour.

Unpermitted Emission Units and Pollution Control Equipment

There are no unpermitted facilities operating at this source during this review process.

New Emission Units and Pollution Control Equipment Receiving Prior Approval

There are no new emission units proposed at this source during this review process.

Insignificant Activities

The source also consists of the following insignificant activities, as defined in 326 IAC 2-7-1(21):

(a) Natural gas-fired combustion sources with heat input equal to or less than ten million (10,000,000) British thermal units per hour, including:

(1) One (1) natural gas fired heater, capacity: 1.7 million British thermal units per hour.

(2) Three (3) natural gas fired forced air systems, capacity: 0.58 million British thermal units per hour, each.

(b) Trimmers that do not produce fugitive emissions and that are equipped with a dust collection or trim material recovery device such as a bag filter or cyclone (Table saw equipped with a self contained vacuum drum).

(c) Closed loop heating and cooling systems.

(d) Water based adhesives that are less than or equal to 5% by volume of VOCs, excluding HAPs.

Existing Approvals

The source has been operating under the following previous approvals including:

(a) T141-7805-00058, issued on November 17, 1998;

(b) Minor Permit Modification 141-10708, issued on April 20, 1999;

(c) Minor Source Modification 141-10950, issued on August 10, 1999;

(d) Administrative Amendment 141-12140, issued on May 6, 2000;

(e) Administrative Amendment 141-12953, issued on February 19, 2001;

(f) Administrative Amendment 141-13951, issued on April 18, 2001;

(g) Administrative Amendment 141-14367, issued on June 18, 2001;

(h) Reopening 141-13472, issued on April 16, 2002;

(h) Administrative Amendment 141-15517, issued on July 16, 2002;

(i) Significant Source Modification 141-17748, issued on October 16, 2003; and

(j) Significant Permit Modification 141-18045, not yet issued.

All terms and conditions from previous approvals issued pursuant to the permitting programs approved into the State Implementation Plan have been either incorporated as originally stated, revised, or deleted by this permit. All previous approvals are superseded upon issuance of this permit.

The following terms and conditions from previous approvals have been determined to be no longer applicable, and, therefore, are not incorporated into this permit:

(a) T141-7805-00058, issued on November 17, 1998, and subsequently modified:

Condition D.1.1(a): Spray booths C and D shall use less than twenty-five (25) tons of VOC, including coatings, dilution solvents, and cleaning solvents, per twelve (12) consecutive month period. Compliance with this limit makes 326 IAC 8-1-6 (General Reduction Requirements for New Facilities) not applicable.

Condition D.1.10: A quarterly summary of the information to document compliance with Condition D.1.1 shall be submitted to the addresses listed in Section C - General Reporting Requirements, of this permit, using the reporting form located at the end of this permit, or its equivalent, within thirty (30) days after the end of the quarter being reported.

Reason not incorporated: Based on updated coating information, the unrestricted potential VOC usage from each spray booth is less than twenty-five (25) tons per year. Therefore, the VOC usage at booths C and D is not limited to less than twenty-five (25) tons per year, but any change or modification that increases the potential VOC emissions to 25 tons per year or more from those booths must be approved by OAQ before such change may occur. No reporting is required.

(b) T141-7805-00058, issued on November 17, 1998, and subsequently modified:

Condition D.2.1(c): The PM_{10} emissions from the machining and woodworking equipment exhausting to cyclone/baghouse DC1 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air, and the PM_{10} emissions from the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall be limited to 0.03 grain per dry standard cubic foot of exhaust air. The flow rate at the machining and woodworking equipment

exhausting to cyclone/baghouse DC1 shall not exceed 60,677 dry standard cubic feet and the flow rate at the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall not exceed 46,760 dry standard cubic feet. These limitations, in conjunction with the limitations in (a) and (b) of this condition, shall limit the potential to emit PM and PM_{10} to 27.6 pounds per hour, equivalent to 121 tons per year from the machining and woodworking operations, and less than 250 tons per year from the entire source. Therefore, the requirements of 326 IAC 2-2 are not applicable.

Reason not incorporated: This limitation will remain in the permit for PM. The potential to emit PM_{10} is limited to less than 100 tons per year pursuant to 326 IAC 2-8-4, FESOP. That limit will also ensure that this source is a minor source pursuant to 326 IAC 2-2, PSD, for PM_{10}. Therefore, this limit for PM_{10} emissions is no longer required.

(c) All construction conditions from all previous permits.

Reason not incorporated: All facilities previously permitted have already been constructed. Therefore, the construction conditions are no longer necessary as part of the operating permit. Any facilities that were previously permitted but have not yet been constructed would need new pre-construction approval before beginning construction.

Enforcement Issue

There are no enforcement actions pending.

Recommendation

The staff recommends to the Commissioner that the FESOP be approved. This recommendation is based on the following facts and conditions:

Unless otherwise stated, information used in this review was derived from the application and additional information submitted by the applicant.

An administratively complete Part 70 Renewal application was received on February 17, 2003. On September 10, 2003, the applicant requested a FESOP rather than a Part 70 permit renewal. Additional information was received on September 19 and 26, 2003.

There was no notice of completeness letter mailed to the source.

Emission Calculations

See pages 1 through 5 of Appendix A of this document for detailed emissions calculations.

Potential emissions from the insignificant table saw used for cutting cull for disposal are calculated as follows:

200 pounds cull/day x 365 days/yr x 1% of cull lost in cutting = 365 lbs/yr = 0.1825 tons/year

0.1825 tons/yr x (1- 0.90 control efficiency) = 0.018 tons/year

The applicant conservatively estimates PM and PM_{10} emissions from insignificant activities at 2.00 tons per year.

Potential To Emit

Pursuant to 326 IAC 2-1.1-1(16), Potential to Emit is defined as "the maximum capacity of a stationary source to emit any air pollutant under its physical and operational design. Any physical or operational limitation on the capacity of a source to emit an air pollutant, including air pollution control equipment and restrictions on hours of operation or type or amount of material combusted, stored, or processed shall be treated as part of its design if the limitation is enforceable by the U. S. EPA."

This table reflects the PTE before controls. Control equipment is not considered federally enforceable until it has been required in a federally enforceable permit.

Pollutant	**Potential To Emit** (tons/year)
PM	1,514
PM_{10}	1,514
SO_2	0.009
VOC	17.9
CO	1.27
NO_X	1.51

Note: For the purpose of determining Title V applicability for particulates, PM_{10}, not PM, is the regulated pollutant in consideration.

HAPs	**Potential To Emit** (tons/year)
Glycol Ethers	11.9
Ethylene glycol	0.088
Benzene	0.00003
Dichlorobenzene	0.00002
Formaldehyde	0.001
Hexane	0.027
Toluene	0.00005
Lead	0.00001
Cadmium	0.00002
Chromium	0.00002
Manganese	0.00001
Nickel	0.00003
TOTAL	11.9

(a) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of PM_{10} is equal to or greater than one hundred (100) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(b) The potential to emit (as defined in 326 IAC 2-1.1-1(16)) of any single HAP is equal to or greater than ten (10) tons per year and the potential to emit (as defined in 326 IAC 2-7-1(29)) of a combination HAPs is greater than or equal to twenty-five (25) tons per year. Therefore, the source is subject to the provisions of 326 IAC 2-7.

(c) Fugitive Emissions

Since this type of operation is not one of the twenty-eight (28) listed source categories under 326 IAC 2-2 and since there are no applicable New Source Performance Standards that were in effect on August 7, 1980, the fugitive emissions are not counted toward determination of PSD and Emission Offset applicability.

(d) This source, otherwise required to obtain a Title V permit, has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, this source will be issued a Federally Enforceable State Operating Permit (FESOP), pursuant to 326 IAC 2-8.

Actual Emissions

The following table shows the actual emissions from the source. This information reflects the 2001 OAQ emission data. The HAP data is for 2002 and was provided by the applicant.

Pollutant	**Actual Emissions** (tons/year)
PM	not reported
PM_{10}	1
SO_2	-
VOC	3
CO	-
NO_X	-
HAP (Glycol Ethers)	3.02

Potential to Emit After Issuance

The table below summarizes the potential to emit, reflecting all limits, of the significant emission units after controls. The control equipment is considered federally enforceable only after issuance of this Federally Enforceable State Operating Permit.

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Four (4) spray booths (AB, C, D and E)	< 8.00	< 8.00	-	12.9	-	-	9.97 individual; 24.9 total
Machining and woodworking equipment, controlled by a cyclone/baghouse system (DC1)	68.3	< 40.0	-	-	-	-	-

	Limited Potential to Emit (tons/year)						
Process/facility	**PM**	**PM_{10}**	**SO_2**	**VOC**	**CO**	**NO_X**	**HAPs**
Machining and woodworking equipment, controlled by a single baghouse dust collector (DC2)	52.6	< 50.0	-	-	-	-	-
Insignificant Activities	2.00	2.00	0.009	5.00	1.27	1.51	0.028
Total Emissions	131	< 100	0.009	17.9	1.27	1.51	Single <10 Total <25

The values in the table represent the unrestricted potential emissions of SO_2, CO, VOC and NO_X. The potential to emit PM is limited as indicated under "326 IAC 2-2 (Prevention of Significant Deterioration (PSD))" and the potential to emit PM_{10} and HAPs is limited as indicated under "326 IAC 20-8-4 (FESOP)" in the *State Rule Applicability - Entire Source* section of this document.

County Attainment Status

The source is located in St. Joseph County.

Pollutant	Status
PM_{10}	Attainment
SO_2	Attainment
NO_2	Attainment
Ozone	Maintenance
CO	Attainment
Lead	Attainment

(a) Volatile organic compounds (VOC) are precursors for the formation of ozone. Therefore, VOC emissions are considered when evaluating the rule applicability relating to the ozone standards. St. Joseph County has been designated as attainment or unclassifiable for ozone.

(b) St. Joseph County has been classified as attainment or unclassifiable for all remaining criteria pollutants. Therefore, these emissions were reviewed pursuant to the requirements for Prevention of Significant Deterioration (PSD), 326 IAC 2-2.

Federal Rule Applicability

(a) There are no New Source Performance Standards (NSPS) (326 IAC 12 and 40 CFR Part 60) applicable to this source.

(b) Pursuant to 40 CFR 63.4681(b), the requirements of Subpart QQQQ - National Emission Standards for Hazardous Air Pollutants: Surface Coating of Wood Building Products, are applicable to new, reconstructed, or existing affected sources, as defined in 40 CFR 63.4682, that use 4,170 liters (1,100 gallons) per year, or more, of coatings and that is a major source, is located at a major source, or is part of a major source of emissions of hazardous air pollutants (HAP). The potential to emit each individual HAP is limited to less than ten (10) tons per year, and the potential to emit any combination of HAPs is limited to less than twenty-five (25) tons per year in order to comply with 326 IAC 2-8-4, FESOP (see 326 IAC 2-8-4 (FESOP), below). Therefore, this source is not a major source of HAPs, and the requirements of 40 CFR 63, Subpart QQQQ, are not applicable. If this source were subject to Subpart QQQQ, the compliance date would be May 28, 2006. Therefore, previous HAP emissions do not count towards the applicability of this rule.

(c) This source is not required to obtain a Part 70 Operating Permit because this source has agreed to accept a permit with federally enforceable limits that restrict its PTE to below the Title V emission levels. Therefore, the requirements of 40 CFR 64, Compliance Assurance Monitoring, are not applicable.

State Rule Applicability - Entire Source

326 IAC 2-2 (Prevention of Significant Deterioration (PSD))

Construction of the source commenced prior to August 7, 1977. Therefore, it was not subject to the PSD requirements of 326 IAC 2-2. The source, which is not one of the twenty-eight (28) listed source categories in 326 IAC 2-2, has since been modified. The applicant has accepted limits so that the source has remained a minor source pursuant to 326 IAC 2-2, PSD. The limits are as follows:

(a) Pursuant to Significant Source Modification 141-17748 issued on October 16, 2003, and 326 IAC 6-1-2(a)(Nonattainment Area Particulate Limitations), particulate emissions from the machining and woodworking equipment exhausting to cyclone/ baghouse DC1 are limited to 0.03 grain per dry standard cubic foot of exhaust air, and particulate emissions from the machining and woodworking equipment exhausting to baghouse dust collector DC2 are limited to 0.03 grain per dry standard cubic foot of exhaust air (see 326 IAC 6-1, below). The flow rate at the machining and woodworking equipment exhausting to DC1 shall not exceed 60,677 dry standard cubic feet and the flow rate at the machining and woodworking equipment exhausting to DC2 shall not exceed 46,760 dry standard cubic feet. Those flow rates represent the maximum flow rates provided by the applicant. This limits the potential to emit PM to 15.6 pounds per hour from the machining and woodworking equipment exhausting to cyclone/ baghouse DC1, and 12.0 pounds per hour from the machining and woodworking equipment exhausting to baghouse dust collector DC2, equivalent to 121 tons per year, total, from the machining and woodworking operations, and 131 tons per year, which is less than 250 tons per year, from the entire source (including the less than 8.00 tons per year from the spray booths (limited as indicated under 326 IAC 2-8-4, below) and 2.00 tons per year from insignificant activities).

(b) The potential to emit PM_{10} is limited to less than 100 tons per year pursuant to 326 IAC 2-8-4 (see below). Therefore, the requirements of 326 IAC 2-2 are not applicable.

(c) The unrestricted potential emissions of VOC, NO_X, CO and SO_2 are less than 100 tons per year.

326 IAC 2-4.1-1 (New Source Toxics Control)

The potential to emit any single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the facilities at this source are not major sources of HAPs, and the requirements of 326 IAC 2-4.1-1 are not applicable.

326 IAC 2-6 (Emission Reporting)

This source is subject to 326 IAC 2-6 (Emission Reporting), because it has the potential to emit more than ten (10) tons per year of VOC in St. Joseph County. Pursuant to this rule, the owner/ operator of the source must annually submit an emission statement for the source. The annual statement must be received by April 15 of each year and contain the minimum requirement as specified in 326 IAC 2-6-4. The submittal should cover the period defined in 326 IAC 2-6-2(8) (Emission Statement Operating Year).

326 IAC 2-8-4 (FESOP)

Pursuant to this rule, the amount of PM_{10} shall be limited to less than one hundred (100) tons per year. In addition, the amount of a single HAP shall be limited to less than ten (10) tons per year and the combination of all HAPs shall be limited to less than twenty-five (25) tons per year. Therefore, the requirements of 326 IAC 2-7, do not apply. Specific limitations are as follows:

(a) The potential to emit PM_{10} is limited as follows:

(1) The potential to emit PM_{10} from the machining and woodworking equipment exhausting to cyclone/ baghouse DC1 shall not exceed 1.21 pounds per ton of raw materials throughput. This will limit the potential to emit PM_{10} to less than 40.0 tons per year, when operating at the maximum raw material throughput rate of 15,000 pounds per hour, equivalent to 65,700 tons per year. Since the potential to emit PM_{10} from the machining and woodworking equipment exhausting to cyclone/ baghouse DC1 is 4.33 tons per year after control, the machining and woodworking equipment will comply with this limitation. Operation of the cyclone/baghouse (DC1) is required for compliance with this limit.

(2) The potential to emit PM_{10} from the machining and woodworking equipment exhausting to baghouse dust collector DC2 shall not exceed 1.22 pounds per ton of raw materials throughput. This will limit the potential to emit PM_{10} to less than 50.0 tons per year, when operating at the maximum raw material throughput rate of 18,700 pounds per hour, equivalent to 81,906 tons per year. Since the potential to emit PM_{10} from the machining and woodworking equipment exhausting to baghouse dust collector DC2 is 0.105 ton per year after control, the machining and woodworking equipment will comply with this limitation. Operation of the baghouse dust collector (DC2) is required for compliance with this limit.

(3) Based on the information provided by the applicant, the source potentially emits 26.0 tons per year before controls and 2.08 tons per year after controls, total, of PM and PM_{10} from the four (4) spray booths, identified as AB, C, D and E. Thus, the potential solids usage rate based on current materials is 86.7 tons per year. Any change or modification that increases the solids usage rate at the total of the four (4) spray booths to more than 333 tons per consecutive twelve (12) month period, total, will

increase the potential to emit PM and PM_{10} from the four (4) spray booths to 8.00 tons per year or more based on a seventy percent (70%) transfer efficiency and a dry filter control efficiency of ninety-two percent (92%). Such change or modification would increase the PM and PM_{10} emissions to 100 and 250 tons per year or more, respectively, from the entire source and may cause the source to become subject to 326 IAC 2-7, Part 70, and 326 IAC 2-2, PSD. Therefore, the Permittee is required to obtain prior IDEM, OAQ, approval before such change or modification may occur. In addition, the dry filters must be in operation and control emissions from the four (4) spray booths at all times when the spray booths are in operation in order to comply with this limit.

As a result of these limitations, the potential to emit PM_{10} will be limited to less than 100 tons per year, including 2.00 tons per year from insignificant activities. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable. This will also make the requirements of 326 IAC 2-2, PSD, not applicable for PM_{10}.

(b) The use of each individual HAP, including HAPs from coatings, dilution solvents, and cleaning solvents, at the four (4) spray booths, identified as AB, C, D and E, shall be limited to 9.97 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month, and the use of any combination of HAPs, including HAPs from coatings, dilution solvents, and cleaning solvents, at the three (3) spray booths shall be limited to 24.9 tons per twelve (12) consecutive month period, total, with compliance determined at the end of each month. The unrestricted potential individual organic HAP emissions from the total of all insignificant activities is 0.028 tons per year, and the total HAP emissions from the total of all insignificant activities is 0.028 tons per year. Therefore, this will limit the total source potential to emit each individual HAP to less than 10 tons per year, and the potential to emit total HAPs to less than 25 tons per year. Therefore, the requirements of 326 IAC 2-7, Part 70, are not applicable.

326 IAC 5-1 (Opacity Limitations)

This source is located north of Kern Road and East of Pine Road in St. Joseph County. Therefore, pursuant to 326 IAC 5-1-2 (Opacity limitations), except as provided in 326 IAC 5-1-3 (Temporary alternative opacity limitations), opacity shall meet the following, unless otherwise stated in this permit:

(a) Visible emissions shall not exceed an average of thirty percent (30%) opacity in twenty-four (24) consecutive readings, as determined in 326 IAC 5-1-4.

(b) Opacity shall not exceed sixty percent (60%) for more than a cumulative total of fifteen (15) minutes (sixty (60) readings as measured according to 40 CFR Part 60, Appendix A, Method 9 or fifteen (15) one (1) minute nonoverlapping integrated averages for a continuous opacity monitor) in a six (6) hour period.

State Rule Applicability - Individual Facilities

326 IAC 8-2-10 (Flat wood panels; Manufacturing Operations)

This source does not perform flat wood manufacturing and surface finishing printed interior panels made of hardwood plywood and thin particle board, natural finish hardwood plywood panels or hardboard paneling with Class II finishes. Therefore, this source is not subject to the requirements of 326 IAC 8-2-10.

326 IAC 8-1-6 (New facilities; General reduction requirements)

The four (4) spray booths at this source do not operate in series with one another. Thus, they are considered separate facilities. The potential VOC emissions at each booth is less than 25 tons per year. Therefore, the requirements of 326 IAC 8-1-6 are not applicable.

326 IAC 6-1 (County Specific Particulate Matter Limitations)

This source, which is not specifically listed in 326 IAC 6-1-8.1 through 18, has a potential to emit more than 100 tons per year of particulate. Therefore, the requirements of 326 IAC 6-1 are applicable.

(a) Pursuant to 326 IAC 6-1-2(a), the particulate from the machining and woodworking equipment controlled by a cyclone/baghouse system identified as DC1 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). This is equivalent to 15.6 pounds per hour when operating at a flow rate of 60,677 acfm. The potential PM emissions after control by the cyclone/baghouse are 0.99 pound per hour, and, according to the information supplied by the applicant, the outlet grain loading is 0.0019 grains per dry standard cubic foot. Therefore, the machining and woodworking operations will comply with this rule.

(b) Pursuant to 326 IAC 6-1-2(a), the particulate from the machining and woodworking, exhausting through baghouse dust collector DC2 shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). This is equivalent to 12.0 pounds per hour when operating at a flow rate of 46,760 acfm. The potential PM emissions after control by the baghouse dust collector are 0.024 pound per hour, and, according to the information supplied by the applicant, the outlet grain loading is 0.00006 grains per dry standard cubic foot. Therefore, the machining and woodworking operations will comply with this rule.

(c) Pursuant to 326 IAC 6-1-2(a), the particulate from the surface coating operations shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). The coating facilities, equipped with dry filters, shall comply with this rule.

(d) Pursuant to 326 IAC 6-1-2(a), the particulate from the insignificant trimmers, the insignificant heater and the insignificant forced air systems shall not exceed seven-hundredths (0.07) gram per dry standard cubic meter (g/dscm) (three-hundredths (0.03) grain per dry standard cubic foot (dscf)). The trimmer is equipped with dry a self contained vacuum drum, and the heater and forced air systems operate on natural gas only. Therefore, the facilities shall comply with this rule.

326 IAC 6-3-2 (Particulate Emission Limitations for Manufacturing Processes)

The facilities at this source are subject to the requirements of 326 IAC 6-1. Therefore, pursuant to 326 IAC 6-3-1(c)(3), the requirements of 326 IAC 6-3 are not applicable.

Testing Requirements

Pursuant to Significant Source Modification 141-17748 issued on October 16, 2003, PM and PM_{10} testing for the machining and woodworking equipment exhausting to baghouse dust collector DC2 is required within one hundred and eighty (180) days after initial startup, in order to demonstrate com-

pliance with 326 IAC 6-1 and the limitations that make the source a minor source pursuant to 326 IAC 2-2. Since the PM_{10} limit is revised in this permit to make 326 IAC 2-7 not applicable, the testing must also demonstrate compliance with the PM_{10} limitations of 326 IAC 2-8-4, FESOP.

Compliance Requirements

Permits issued under 326 IAC 2-8 are required to ensure that sources can demonstrate compliance with applicable state and federal rules on a more or less continuous basis. All state and federal rules contain compliance provisions, however, these provisions do not always fulfill the requirement for a more or less continuous demonstration. When this occurs IDEM, OAQ, in conjunction with the source, must develop specific conditions to satisfy 326 IAC 2-8-4. As a result, compliance requirements are divided into two sections: Compliance Determination Requirements and Compliance Monitoring Requirements.

Compliance Determination Requirements in Section D of the permit are those conditions that are found more or less directly within state and federal rules and the violation of which serves as grounds for enforcement action. If these conditions are not sufficient to demonstrate continuous compliance, they will be supplemented with Compliance Monitoring Requirements, also Section D of the permit. Unlike Compliance Determination Requirements, failure to meet Compliance Monitoring conditions would serve as a trigger for corrective actions and not grounds for enforcement action. However, a violation in relation to a compliance monitoring condition will arise through a source's failure to take the appropriate corrective actions within a specific time period.

The compliance monitoring requirements applicable to this source are as follows:

(a) The machining and woodworking has applicable compliance monitoring conditions as specified below:

(1) Daily visible emission notations of the machining and woodworking stack (DCX) exhaust shall be performed during normal daylight operations when exhausting to the atmosphere. A trained employee shall record whether emissions are normal or abnormal. For processes operated continuously, "normal" means those conditions prevailing, or expected to prevail, eighty percent (80%) of the time the process is in operation, not counting startup or shut down time. In the case of batch or discontinuous operations, readings shall be taken during that part of the operation that would normally be expected to cause the greatest emissions. A trained employee is an employee who has worked at the plant at least one (1) month and has been trained in the appearance and characteristics of normal visible emissions for that specific process. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when an abnormal emission is observed. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(2) An inspection shall be performed each calendar quarter of all bags controlling the machining and woodworking operation when venting to the atmosphere. A baghouse inspection shall be performed within three months of redirecting vents to the atmosphere and every three months thereafter. Inspections are optional when venting indoors. All defective bags shall be replaced.

(3) In the event that bag failure has been observed:

(A) For multi-compartment units, the affected compartments will be shut down immediately until the failed units have been repaired or replaced. Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit. If operations continue after bag failure is observed and it will be 10 days or more after the failure is observed before the failed units will be repaired or replaced, the Permittee shall promptly notify the IDEM, OAQ of the expected date the failed units will be repaired or replaced. The notification shall also include the status of the applicable compliance monitoring parameters with respect to normal, and the results of any response actions taken up to the time of notification.

(B) For single compartment baghouses, if failure is indicated by a significant drop in the baghouse's pressure readings with abnormal visible emissions or the failure is indicated by an opacity violation, or if bag failure is determined by other means, such as gas temperatures, flow rates, air infiltration, leaks, dust traces or triboflows, then failed units and the associated process will be shut down immediately until the failed units have been repaired or replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

(4) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the cyclone/baghouse system (DC1) and the baghouse dust collector (DC2) for the machining and woodworking must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment Area Particulate Limitations) and 326 IAC 2-8 (FESOP) and to ensure that the source is a minor source pursuant to 326 IAC 2-2 (PSD).

(b) The four (4) spray booths (AB, C, D and E) have applicable compliance monitoring conditions as specified below:

(1) Daily inspections shall be performed to verify the placement, integrity and particle loading of the filters. To monitor the performance of the dry filters, weekly observations shall be made of the overspray from the surface coating booth stacks (A, B, C, D and E) while one or more of the booths are in operation. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(2) Monthly inspections shall be performed of the coating emissions from the stack and the presence of overspray on the rooftops and the nearby ground. The Compliance

Response Plan for this unit shall contain troubleshooting contingency and response steps for when a noticeable change in overspray emission, or evidence of overspray emission is observed. The Compliance Response Plan shall be followed whenever a condition exists which should result in a response step. Failure to take response steps in accordance with Section C - Compliance Response Plan -Preparation, Implementation, Records, and Reports, shall be considered a violation of this permit.

(3) Additional inspections and preventive measures shall be performed as prescribed in the Preventive Maintenance Plan.

These monitoring conditions are necessary because the dry filters for the spray booths must operate properly to ensure compliance with 326 IAC 6-1 (Nonattainment Area Particulate Limitations) and 326 IAC 2-8 (FESOP) and to ensure that the source is a minor source pursuant to 326 IAC 2-2 (PSD).

Conclusion

The operation of this wood door manufacturing source shall be subject to the conditions of the attached proposed FESOP No.: F 141-17223-00058.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
Insignificant Heater and Forced Air Systems

Company Name: Mohawk Flush Doors, Inc.
Address City IN Zip: 402 N. Sheridan, South Bend, IN 46619
Operation Permit: F141-17223
Plt ID: 141-00058
Reviewer: CarrieAnn Paukowits
Date: February 17, 2003

Heat Input Capacity MMBtu/hr	Potential Throughput MMCF/yr
3.44	30.13

	Pollutant					
	PM*	PM10*	SO2	NOx	VOC	CO
Emission Factor in lb/MMCF	1.90	7.60	0.600	100 **see below	5.50	84.0
Potential Emission in tons/yr	0.029	0.115	0.009	1.51	0.083	1.27

*PM emission factor is filterable PM only. PM10 emission factor is filterable and condensable PM10 combined.
**Emission Factors for NOx: Uncontrolled = 100, Low NOx Burner = 50, Low NOx Burners/Flue gas recirculation = 3

Methodology

All emission factors are based on normal firing.
MMBtu = 1,000,000 Btu
MMCF = 1,000,000 Cubic Feet of Gas

Potential Throughput (MMCF) = Heat Input Capacity (MMBtu/hr) x 8,760 hrs/yr x 1 MMCF/1,000 MMI
Emission Factors are from AP 42, Chapter 1.4, Tables 1.4-1, 1.4-2, 1.4-3, SCC #1-02-006-02, 1-01-006-02, 1-03-006-02, and 1-03-0
(SUPPLEMENT D 3/98)
Emission (tons/yr) = Throughput (MMCF/yr) x Emission Factor (lb/MMCF)/2,000 lb/tor
See page 5 for HAPs emissions calculations.

Appendix A: Emissions Calculations
Natural Gas Combustion Only
MM BTU/HR <100
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Company Name: **Mohawk Flush Doors, Inc.**
Address City IN Zip: **402 N. Sheridan, South Bend, IN 46619**
Operation Permit: **F141-17223**
Plt ID: **141-00058**
Reviewer: **CarrieAnn Paukowits**
Date: **February 17, 2003**

	HAPs - Organics				
	Benzene	Dichlorobenze	Formaldehyd	Hexane	Toluene
Emission Factor in lb/MMcf	0.002	0.001	0.075	1.80	0.003
Potential Emission in tons/yr	3.16E-05	1.81E-05	1.13E-03	2.71E-02	5.12E-05

	HAPs - Metals					
	Lead	Cadmium	Chromium	Manganese	Nickel	
Emission Factor in lb/MMcf	0.001	0.001	0.001	0.0004	0.002	**Total**
Potential Emission in tons/yr	7.53E-06	1.66E-05	2.11E-05	5.73E-06	3.16E-05	**0.028**

Methodology is the same as page 4.

The five highest organic and metal HAPs emission factors are provided above.
Additional HAPs emission factors are available in AP-42, Chapter 1.4.

Appendix A: Emissions Calculations
VOC and Particulate
From Surface Coating Operations

Company Name: Mohawk Flush Doors, Inc.
Address City IN Zip: 402 N. Sheridan, South Bend, IN 46619
Operation Permit: F141-17223
Plt ID: 141-00058
Reviewer: CarrieAnn Paukowits
Date: February 17, 2003

Material	Density (Lb/Gal)	Weight % Volatile (H20& Organics)	Weight % Water	Weight % Organics	Volume % Water	Volume % Non-Vol (solids)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Pounds VOC per gallon of coating less water	Pounds VOC per gallon of coating	Potential VOC pounds per hour	Potential VOC pounds per day	Potential VOC tons per year	Particulate Potential ton/yr	lb VOC /gal solids	Transfer Efficiency
Spray Booth AB																
680-30C5-334SB-Mwk TC ES	8.60	64.80%	49.6%	15.2%	51.2%	31.19%	0.00547	103	2.68	1.31	0.74	17.68	3.23	2.24	4.19	70%
660-D5-113A-White	9.84	50.45%	44.8%	5.6%	52.9%	39.46%	0.00547	103	1.18	0.56	0.31	7.52	1.37	3.61	1.41	70%
650-W5M-353SB-Primer	12.54	34.48%	32.8%	1.7%	49.4%	47.79%	0.00547	103	0.42	0.21	0.12	2.85	0.52	6.08	0.44	70%
644-D5-586B-Stain	8.39	96.64%	92.3%	4.3%	92.9%	2.67%	0.00547	103	5.13	0.36	0.21	4.92	0.90	0.21	13.64	70%
641-D5-158-Flood	10.35	50.35%	50.0%	0.3%	62.1%	37.44%	0.00547	103	0.10	0.04	0.02	0.49	0.09	3.80	0.10	70%
631-E5-744SB-Rustic White	13.04	32.75%	32.6%	0.2%	51.0%	48.72%	0.00547	103	0.04	0.02	0.01	0.26	0.05	6.49	0.04	70%
621-D5-Mwk Stain	9.39	54.01%	49.5%	4.5%	55.9%	37.65%	0.00547	103	0.96	0.42	0.24	5.73	1.05	3.20	1.12	70%
624-D5-Mwk Toner Stain	9.28	53.19%	48.4%	4.8%	53.8%	39.54%	0.00547	103	0.96	0.44	0.25	6.01	1.10	3.22	1.12	70%
Spray Booth C																
680-30C5-334SB-Mwk TC ES	8.60	64.80%	49.6%	15.2%	51.2%	31.19%	0.00547	103	2.68	1.31	0.74	17.68	3.23	2.24	4.19	70%
660-D5-113A-White	9.84	50.45%	44.8%	5.6%	52.9%	39.46%	0.00547	103	1.18	0.56	0.31	7.52	1.37	3.61	1.41	70%
650-W5M-353SB-Primer	12.54	34.48%	32.8%	1.7%	49.4%	47.79%	0.00547	103	0.42	0.21	0.12	2.85	0.52	6.08	0.44	70%
644-D5-586B-Stain	8.39	96.64%	92.3%	4.3%	92.9%	2.67%	0.00547	103	5.13	0.36	0.21	4.92	0.90	0.21	13.64	70%
641-D5-158-Flood	10.35	50.35%	50.0%	0.3%	62.1%	37.44%	0.00547	103	0.10	0.04	0.02	0.49	0.09	3.80	0.10	70%
631-E5-744SB-Rustic White	13.04	32.75%	32.6%	0.2%	51.0%	48.72%	0.00547	103	0.04	0.02	0.01	0.26	0.05	6.49	0.04	70%
621-D5-Mwk Stain	9.39	54.01%	49.5%	4.5%	55.9%	37.65%	0.00547	103	0.96	0.42	0.24	5.73	1.05	3.20	1.12	70%
624-D5-Mwk Toner Stain	9.28	53.19%	48.4%	4.8%	53.8%	39.54%	0.00547	103	0.96	0.44	0.25	6.01	1.10	3.22	1.12	70%
Spray Booth D																
680-30C5-334SB-Mwk TC ES	8.60	64.80%	49.6%	15.2%	51.2%	31.19%	0.00547	103	2.68	1.31	0.74	17.68	3.23	2.24	4.19	70%
660-D5-113A-White	9.84	50.45%	44.8%	5.6%	52.9%	39.46%	0.00547	103	1.18	0.56	0.31	7.52	1.37	3.61	1.41	70%
650-W5M-353SB-Primer	12.54	34.48%	32.8%	1.7%	49.4%	47.79%	0.00547	103	0.42	0.21	0.12	2.85	0.52	6.08	0.44	70%
644-D5-586B-Stain	8.39	96.64%	92.3%	4.3%	92.9%	2.67%	0.00547	103	5.13	0.36	0.21	4.92	0.90	0.21	13.64	70%
641-D5-158-Flood	10.35	50.35%	50.0%	0.3%	62.1%	37.44%	0.00547	103	0.10	0.04	0.02	0.49	0.09	3.80	0.10	70%
631-E5-744SB-Rustic White	13.04	32.75%	32.6%	0.2%	51.0%	48.72%	0.00547	103	0.04	0.02	0.01	0.26	0.05	6.49	0.04	70%
621-D5-Mwk Stain	9.39	54.01%	49.5%	4.5%	55.9%	37.65%	0.00547	103	0.96	0.42	0.24	5.73	1.05	3.20	1.12	70%
624-D5-Mwk Toner Stain	9.28	53.19%	48.4%	4.8%	53.8%	39.54%	0.00547	103	0.96	0.44	0.25	6.01	1.10	3.22	1.12	70%
Spray Booth E																
680-30C5-334SB-Mwk TC ES	8.60	64.80%	49.6%	15.2%	51.2%	31.19%	0.00547	103	2.68	1.31	0.74	17.68	3.23	2.24	4.19	70%
660-D5-113A-White	9.84	50.45%	44.8%	5.6%	52.9%	39.46%	0.00547	103	1.18	0.56	0.31	7.52	1.37	3.61	1.41	70%
650-W5M-353SB-Primer	12.54	34.48%	32.8%	1.7%	49.4%	47.79%	0.00547	103	0.42	0.21	0.12	2.85	0.52	6.08	0.44	70%
644-D5-586B-Stain	8.39	96.64%	92.3%	4.3%	92.9%	2.67%	0.00547	103	5.13	0.36	0.21	4.92	0.90	0.21	13.64	70%
641-D5-158-Flood	10.35	50.35%	50.0%	0.3%	62.1%	37.44%	0.00547	103	0.10	0.04	0.02	0.49	0.09	3.80	0.10	70%
631-E5-744SB-Rustic White	13.04	32.75%	32.6%	0.2%	51.0%	48.72%	0.00547	103	0.04	0.02	0.01	0.26	0.05	6.49	0.04	70%
621-D5-Mwk Stain	9.39	54.01%	49.5%	4.5%	55.9%	37.65%	0.00547	103	0.96	0.42	0.24	5.73	1.05	3.20	1.12	70%
624-D5-Mwk Toner Stain	9.28	53.19%	48.4%	4.8%	53.8%	39.54%	0.00547	103	0.96	0.44	0.25	6.01	1.10	3.22	1.12	70%
State Potential Emissions			**Add worst case coating to all solvents**							**Totals:**	**2.95**	**70.7**	**12.9**	**26.0**		
										Control Efficiency:	**0.0%**	**0.0%**	**0.0%**	**92.0%**		
METHODOLOGY										**Totals after Control:**	**2.95**	**70.7**	**12.9**	**2.08**		

Pounds of VOC per Gallon Coating less Water = (Density (lb/gal) * Weight % Organics) / (1-Volume % water)
Pounds of VOC per Gallon Coating = (Density (lb/gal) * Weight % Organics)
Potential VOC Pounds per Hour = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr)
Potential VOC Pounds per Day = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (24 hr/day)
Potential VOC Tons per Year = Pounds of VOC per Gallon coating (lb/gal) * Gal of Material (gal/unit) * Maximum (units/hr) * (8760 hr/yr) * (1 ton/2000 lbs)
Particulate Potential Tons per Year = (units/hour) * (gal/unit) * (lbs/gal) * (1- Weight % Volatiles) * (1-Transfer efficiency) *(8760 hrs/yr) *(1 ton/2000 lbs)
Pounds VOC per Gallon of Solids = (Density (lbs/gal) * Weight % organics) / (Volume % solids)
Total = Worst Coatings + Sum of all solvents used

Appendix A: Emission Calculations
Machining and Woodworking

Company Name: Mohawk Flush Doors, Inc.
Address City IN Zip: 402 N. Sheridan, South Bend, IN 46619
Operation Permit: F141-17223
Plt ID: 141-00058
Reviewer: CarrieAnn Paukowits
Date: February 17, 2003

Unit ID	Control Efficiency (%)	Grain Loading per Actual Cubic foot of Outlet Air (grains/cub. ft.)	Gas or Air Flow Rate (acfm.)	PM Emission Rate before Controls (lb/hr)	PM Emission Rate before Controls (tons/yr)	PM Emission Rate after Controls (lb/hr)	PM Emission Rate after Controls (tons/yr)
DC1	99.00%	0.00190	60677	98.8	433	0.988	4.33
DC2	99.99%	0.00006	46760	240	1053	0.024	0.105
			Totals:	**339**	**1486**	**1.01**	**4.43**

Methodology

Emission Rate in lbs/hr (after controls) = (grains/cub. ft.) (sq. ft.) ((cub. ft./min.)/sq. ft.) (60 min/hr) (lb/7000 grains)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)

Emission Rate in lbs/hr (before controls) = Emission Rate (after controls): (lbs/hr)/(1-control efficiency)
Emission Rate in tons/yr = (lbs/hr) (8760 hr/yr) (ton/2000 lb)
PM-10 is conservatively estimated to be equal to PM.

Appendix A: Emissions Calculations
HAP Emission Calculations
From Surface Coating Operations

Company Name: Mohawk Flush Doors, Inc.
Address City IN Zip: 402 N. Sheridan, South Bend, IN 46619
Operation Permit: F141-17223
Plt ID: 141-00058
Reviewer: CarrieAnn Paukowits
Date: February 17, 2003

Material	Density (Lb/Gal)	Gal of Mat (gal/unit)	Maximum (unit/hour)	Weight % Glycol Ethers	Weight % Ethylene Glycol	Glycol Ethers Emissions (ton/yr)	Ethylene Glycol Emissions (ton/yr)	Total HAP Emissions (tons/yr)
Spray Booth AB								
680-30C5-334SB-Mwk TC ES	8.60	0.00547	103	14.08%	0.00%	2.99	0.00	2.99
660-D5-113A-White	9.84	0.00547	103	4.56%	0.00%	1.11	0.00	1.11
650-W5M-353SB-Primer	12.54	0.00547	103	1.35%	0.00%	0.42	0.00	0.42
644-D5-586B-Stain	8.39	0.00547	103	1.06%	0.00%	0.22	0.00	0.22
641-D5-158-Flood	10.35	0.00547	103	0.00%	0.00%	0.00	0.00	0.00
631-E5-744SB-Rustic White	13.04	0.00547	103	0.00%	0.00%	0.00	0.00	0.00
621-D5-Mwk Stain	9.39	0.00547	103	0.12%	0.09%	0.03	0.02	0.05
624-D5-Mwk Toner Stain	9.28	0.00547	103	0.00%	0.10%	0.00	0.02	0.02
Spray Booth C								
680-30C5-334SB-Mwk TC ES	8.60	0.00547	103	14.08%	0.00%	2.99	0.00	2.99
660-D5-113A-White	9.84	0.00547	103	4.56%	0.00%	1.11	0.00	1.11
650-W5M-353SB-Primer	12.54	0.00547	103	1.35%	0.00%	0.42	0.00	0.42
644-D5-586B-Stain	8.39	0.00547	103	1.06%	0.00%	0.22	0.00	0.22
641-D5-158-Flood	10.35	0.00547	103	0.00%	0.00%	0.00	0.00	0.00
631-E5-744SB-Rustic White	13.04	0.00547	103	0.00%	0.00%	0.00	0.00	0.00
621-D5-Mwk Stain	9.39	0.00547	103	0.12%	0.09%	0.03	0.02	0.05
624-D5-Mwk Toner Stain	9.28	0.00547	103	0.00%	0.10%	0.00	0.02	0.02
Spray Booth D								
680-30C5-334SB-Mwk TC ES	8.60	0.00547	103	14.08%	0.00%	2.99	0.00	2.99
660-D5-113A-White	9.84	0.00547	103	4.56%	0.00%	1.11	0.00	1.11
650-W5M-353SB-Primer	12.54	0.00547	103	1.35%	0.00%	0.42	0.00	0.42
644-D5-586B-Stain	8.39	0.00547	103	1.06%	0.00%	0.22	0.00	0.22
641-D5-158-Flood	10.35	0.00547	103	0.00%	0.00%	0.00	0.00	0.00
631-E5-744SB-Rustic White	13.04	0.00547	103	0.00%	0.00%	0.00	0.00	0.00
621-D5-Mwk Stain	9.39	0.00547	103	0.12%	0.09%	0.03	0.02	0.05
624-D5-Mwk Toner Stain	9.28	0.00547	103	0.00%	0.10%	0.00	0.02	0.02
Spray Booth E								
680-30C5-334SB-Mwk TC ES	8.60	0.00547	103	14.08%	0.00%	2.99	0.00	2.99
660-D5-113A-White	9.84	0.00547	103	4.56%	0.00%	1.11	0.00	1.11
650-W5M-353SB-Primer	12.54	0.00547	103	1.35%	0.00%	0.42	0.00	0.42
644-D5-586B-Stain	8.39	0.00547	103	1.06%	0.00%	0.22	0.00	0.22
641-D5-158-Flood	10.35	0.00547	103	0.00%	0.00%	0.00	0.00	0.00
631-E5-744SB-Rustic White	13.04	0.00547	103	0.00%	0.00%	0.00	0.00	0.00
621-D5-Mwk Stain	9.39	0.00547	103	0.12%	0.09%	0.03	0.02	0.05
624-D5-Mwk Toner Stain	9.28	0.00547	103	0.00%	0.10%	0.00	0.02	0.02
					Totals:	**11.9**	**0.088**	**11.9**

METHODOLOGY

HAPS emission rate (tons/yr) = Density (lb/gal) * Gal of Material (gal/unit) * Maximum (unit/hr) * Weight % HAP * 8760 hrs/yr * 1 ton/2000 lbs